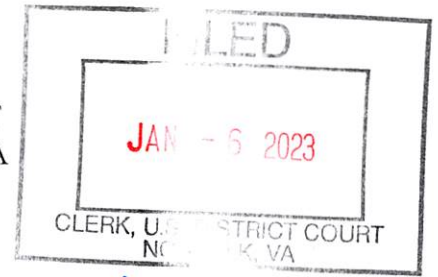


IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
*Newport News Division*



IN RE:	)	
The Sealing of the Criminal Complaint	)	CASE NUMBER 4:23-mj- <u>1</u>
And the Application and Affidavit	)	
In Support of the Criminal Complaint	)	<u>UNDER SEAL</u>

MOTION TO SEAL CRIMINAL COMPLAINT

The United States of America, by and through its attorneys, Jessica D. Aber, United States Attorney for the Eastern District of Virginia, and Peter G. Osyf, Assistant United States Attorney, pursuant to Local Criminal Rule 49(B) moves to seal the criminal complaint and the application and affidavit in support of the criminal complaint in this case. Such sealing is within the discretion of this Court. *In re Baltimore Sun Co. v. Goetz*, 886 F.2d 60, 65 (4th Cir. 1989); *In re Washington Post Co. v. Hughes*, 923 F.2d 324 (4th Cir. 1991); *Media General Operations, Inc., et al. v. Buchanan*, 417 F.3d 424 (4th Cir. 2005). The United States requests that the criminal complaint and the application and affidavit in support of the criminal complaint remain under seal until further Order of this Court.

The criminal investigation in this case is ongoing and may be jeopardized by its premature disclosure. Sealing and preclusion of notice is necessary to avoid notification about the arrest, and to avoid the possibility that, with such notice, the Target may destroy or tamper with evidence, take steps to hide his activities, or otherwise seriously jeopardize the investigation. Another procedure will not adequately protect the needs of law enforcement at this time.

The United States requests that the criminal complaint and the application and affidavit in support of the criminal complaint remain under seal until further order of the Court except that the United States may, without further Order of this Court, provide copies of the warrant, application and affidavit as need be to personnel assisting it in the investigation and prosecution of this matter,

and may disclose these materials as necessary to comply with discovery and disclosure obligations in any prosecutions related to this matter.

Respectfully submitted,

Jessica D. Aber  
United States Attorney

By:



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